

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

JUL 18 2018

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRE KING

Defendants.

4:18CR618 JAR/JMB

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about May 28, 2018, in the City of St. Louis, within the Eastern District of Missouri,

**ANDRE KING,**

the Defendant herein, acting together with persons known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2004 Ford Escape, VIN#1FMYU03114KB19659, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(1).

**COUNT TWO**

The Grand Jury further charges that:

On or about May 28, 2018, in the City of St. Louis, within the Eastern District of Missouri,

**ANDRE KING,**

the Defendant herein, acting together with persons known and unknown to the Grand Jury, knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count One.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

**COUNT THREE**

The Grand Jury further charges that:

On or about May 31, 2018, in the City of St. Louis, within the Eastern District of Missouri,

**ANDRE KING,**

the Defendant herein, acting together with persons known and unknown to the Grand Jury, with intent to cause death and serious bodily harm, did take from the person and presence of another, by force, violence and intimidation, a motor vehicle, that is, a 2003 Chevrolet Trailblazer, VIN#1GNDS13S832251184, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, punishable under Title 18, United States Code, Section 2119(1).

**COUNT FOUR**

The Grand Jury further charges that:

On or about May 31, 2018, in the City of St. Louis, within the Eastern District of Missouri,

**ANDRE KING,**

the Defendant herein, acting together with persons known and unknown to the Grand Jury, knowingly possessed and brandished a firearm, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119, as set forth in Count Three.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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